

Greenbelt, Maryland 20770 phone: 301-459-7590, fax: 301-577-5575 internet: www.jsitel.com, e-mail: jsi@jsitel.com

June 25, 2014

### VIA Electronic Comment Filing System

Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12<sup>th</sup> Street, SW Washington, DC 20554

Re: WC Docket No. 10-90, WC Docket No. 11-42 2014 ETC Annual Report of Thumb Cellular LLC

Study Area Code 319005

Dear Ms. Dortch:

On behalf of Thumb Cellular LLC, JSI files the attached FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules.<sup>1</sup>

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall JSI Vice President 301-459-7590

jkuykendall@jsitel.com

FCC For	rm 481 - Carrier Annual Reporting Data Collection Form			FCC Form 481 OMB Control No. 3060-0 July 2013	986/OMB Control	No. 3060-0819
<010>	Study Area Code	319005				
<015>	Study Area Name	Thumb Cellular LLC	3			
<020>	Program Year	2015				
-	Contact Name: Person USAC should contact with questions about this data	Paul Picklo				
<035>	Contact Telephone Number: Number of the person identified in data line <030>	9894534330 ext.				
<039>	Contact Email Address: Email of the person identified in data line <030>	paulpicklo@thumbce	ellular.com			
ANNUA	AL REPORTING FOR ALL CARRIERS				54.313 Completion Required	54.422 Completion Required
<100>	Service Quality Improvement Reporting		(complete attached wor	ksheet)	√	111111
<200>	Outage Reporting (voice)		(complete attached wor	ksheet)	✓	✓
<210>		outages to report		Г	✓	1111111
<300>	Unfulfilled Service Requests (voice)					
<b>2210</b> 5	Detail on Attempts (vaice)					
<310>	Detail on Attempts (voice)					
				(attach descriptive doc	ument)	
					<b>√</b>	
<320>	Unfulfilled Service Requests (broadband) 0			_		
<330>	Detail on Attempts (broadband)					
13302	Zetan en Attempte (en eausana)			(attach descriptive do	ocument)	
400						
<400> <410>	Number of Complaints per 1,000 customers (voice)  Fixed    O . O					
<420>	Mobile 0.0				<b>→</b>	✓
<430>	Number of Complaints per 1,000 customers (broads	pand)			✓	
<440> <450>	Fixed 0.0  Mobile 0.0					
<500>	Service Quality Standards & Consumer Protection R	ules Compliance	(check to indicate certi	ication)	✓	✓
	319005mi510.pdf					
<510>			(attached descriptive	document)	✓	✓
.600						
<600>	Functionality in Emergency Situations 319005mi610.pdf		(check to indicate certi	ication)	✓	✓
			(attached descriptive do	cument)	✓	<b>✓</b>
<610>			(	,		
	Company Price Offerings (voice)		(complete attached wo			
<710> <800>	Company Price Offerings (broadband)  Operating Companies and Affiliates		(complete attached wo		<del>-  </del>	<u> </u>
	Tribal Land Offerings (Y/N)?	(	(complete attached wo if yes, complete attached wo	Г	✓	
<1000>	Voice Services Rate Comparability		(check to indicate certi	ication)	✓	
<1010>	>		(attach descriptive doc	ument)		
				'		
<1100>	Terrestrial Backhaul (Y/N)?		(if not, check to indicate cert	fication)		
<1110>			(complete attached wa	rksheet)		
	· Terms and Condition for Lifeline Customers		(complete attached wa			✓
	Price Cap Carriers, Proceed to Price Cap Additional	Documentation Wor	<u>ksheet</u>			
~2000·	Including Rate-of-Return Carriers affiliated with Pr	ice Cap Local Exchang		tankta al		
<2000> <2005>			(check to indicate certif			

(check to indicate certification)

(complete attached worksheet)

Rate of Return Carriers, Proceed to  $\underline{\text{ROR Additional Documentation Worksheet}}$ 

<3000>

<3005>

(100) Se Data Cc	(100) Service Quality Improvement Reporting Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013	No. 3060-0819
<010>	Study Area Code	319005	
<015>		Thumb Cellular LLC	
<020>	Program Year	2015	
<030>	Contact Name - Person USAC should contact regarding this data	Paul Picklo	
<032>	Contact Telephone Number - Number of person identified in data line <030>	9894534330 ext.	
<039>	Contact Email Address - Email Address of person identified in data line <030>	paulpicklo@thumbcellular.com	
<110>	Has your company received its ETC certification from the FCC?	(yes / no) O	
<111>>	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(yes / no ) O	
<112><112><113><114><114><1116><1116><1117><1118><118><1118><118><118><118><	If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing \$ 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.  Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. \$ 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.  Please check these boxes below to confirm that the attached documents(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to \$ 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.  Maps detailing progress towards meeting plan targets  Report how much universal service (USF) support was received How (USF) was used to improve service quality  How (USF) was used to improve service coverage  How (USF) was used to improve service capacity provide an explanation of network improvement targets not met in the prior calendar year.	mpany is a  Name of Attached Document	

(200) Serv Data Colle	(200) Service Outage Re Data Collection Form	(200) Service Outage Reporting (Voice) Data Collection Form	(a:						FC( ON July	FCC Form 481 OMB Control No. 3060- July 2013	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013	). 3060-0819
<010>	Study Area Code	λde				319005						
<015>	Study Area Name	ame				Thumb Cellular LLC	lar LLC					
<020>	Program Year					2015						
<030>	Contact Name	Contact Name - Person USAC should contact regarding this data	Should contac	t regarding this	data	Paul Picklo						
<032>	Contact Telep	Contact Telephone Number - Number of person identified in data line <030>	· Number of pe	rson identified	in data line <03	30> 9894534330 ext.	ext.					
<039>	Contact Email	Contact Email Address - Email Address of person identified in data line <030>	il Address of pe	erson identified	in data line <0.		paulpicklo@thumbcellular.com					
<220>	\\	 b1>	<	<	 b4>	<c1></c1>	<0.5	φ	\ \ \	\$	\$ \$	<u>\$</u>
	NORS Reference	Outage Start	Outage Start Outage Start	o	Б	Number of		911 Facilities	Service Outage	Did This Outage Affect Multiple		
	Number	Date	Time	Date	Time	Customers Affected	Total Number of Customers	Affected (Yes / No)	Description (Check all that apply)	Study Areas (Yes / No)	Service Outage Resolution	Preventative Procedures

Page 3

(700) Pric Data Colle	(700) Price Offerings in Data Collection Form	(700) Price Offerings including Voice Rate Data Data Collection Form	Data				FC or or	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013	3 Control No. 3060-0819
<010>	Study Area Code	nde .			319005				
<015>	Study Area Name	ame			Thumb Cellular LLC	lar LLC			
<020>	Program Year				2015				
<030>	Contact Name	Contact Name - Person USAC should contact regarding this data	d contact regardi	ng this data	Paul Picklo				
<032>	Contact Telep	Contact Telephone Number - Number of person identified in data line <030>	er of person ider	tified in data line <	.030> 9894534330 ext.	ext.			
<039>	Contact Email	Contact Email Address - Email Address of person identified in data line <030>	ess of person ide	ntified in data line <		paulpicklo@thumbcellular.com			
<701>	Residential Lo Single State-w	Residential Local Service Charge Effective Date Single State-wide Residential Local Service Charge	active Date	1/1/	/2014				
<703>	<a1></a1>	<a2></a2>	<a3></a3>	 b1>	 	 	        	 	<>>>
	State	Exchange (ILEC)	SAC (CETC)	Rate Type	Residential Local Service Rate	State Subscriber Line Charge	State Universal Service Fee	Mandatory Extended Area Service Charge	Total per line Rates and Fees
					See at	See attached worksheet			
					1				

	(710) Bro Data Coll	(710) Broadband Price Offerings Data Collection Form						FCC Form 481 OMB Control July 2013	481 rol No. 3060-0986/	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
State   Perchange										
17   18   18   18   19   19   19   19   19	<010>				319005					
Contact Name - Person USAC should contact regarding this data line 4339>   2015   2015	<015>				Thumb Cellular	LLC				
State   Exchange (LEC)   Residential Rate   Person Using the data   Person Identified in data line 403D>	<020>				2015					
Contact Telephone Number - Number of person identified in data line 4039b   Paul pt GL owthwhose Little and Fees   Paul pt GL owthwhose Little and Fees   Paul pt GL owthwhose Little and Fees   App   Address of person identified in data line 4039b   Address of person identified in data line 4030b   Address of data and fees	<030>		AC should contact regarding th	nis data	Paul Picklo					
Contact Email Address - Email Address of person identified in data line <030>   Attack   At	<035>		er - Number of person identifie	d in data line <030>	9894534330 ext.					
State Exchange (LLEC)  Residential Rate  State Regulated  Fees Total Rate and Fees  Ownload Speed (Mbps)  Upload Speed (Mbps)  WOTKSTHEET  See attached  WOTKSTHEET  See attached  WOTKSTHEET  State Regulated  Fees Total Rate and Fees  Ownload Speed (Mbps)  Upload Speed (Mbps)  Upload Speed (Mbps)  State Regulated  WOTKSTHEET  WOTKSTHEET  WOTKSTHEET  WOTKSTHEET  WOTKSTHEET  WOTKSTHEET  WOTKSTHEET  WOTKSTHEET  Fees Total Rate and Fees  Ownload Speed (Mbps)  Dipload Speed (Mbps)  State Regulated  Fees Total Rate and Fees  Ownload Speed (Mbps)  Dipload Speed (Mbps)  Fees Altached  Fees Total Rate and Fees Total Rate and Fees Total Rate Rate Rate Rate Rate Rate Rate Rate	<039>		nail Address of person identifie	ed in data line <030>	paulpicklo@thum	mbcellular.com				
State Exchange (ILEC) Residential Rate State Regulated State State State State Regulated State State Regulated State										
Exchange (LLC) Residential Rate Regulated Fees Total Rate and Fees (Mbps)  - See attached WOrkSheet	<711>	<a1></a1>	<a2></a2>	 	<bs></bs> <bs></bs>       <br< td=""><td>&lt;&gt;&gt;&gt;</td><td><d1></d1></td><td><d2></d2></td><td><d3></d3></td><td><d4>&gt;</d4></td></br<>	<>>>	<d1></d1>	<d2></d2>	<d3></d3>	<d4>&gt;</d4>
- See attached worksheet		State	Exchange (ILEC)	Residential Rate		Total Rate and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached { <i>select</i> }
- See attached  worksheet										
- See attached Worksheet -										
- See attached worksheet - See attached leader - See attached lead										
- See attached Worksheet										
worksheet										
Worksheet										
**See attached worksheet										
Worksheet					- See attact	<del>led</del>				
					workehoot	5				
					WOINSHIEGE					

(800) Op Data Col	(800) Operating Companies Data Collection Form			FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	319005		
<015>		Thumb Cellular LLC	LLC	
<020>		2015		
<030>		Paul Picklo		
<035>	Contact Telephone Number - Number of person identified in data line <030>	9894534330 ext.	:	
<039>	Contact Email Address - Email Address of person identified in data line <030>	paulpicklo@th	paulpicklo@thumbcellular.com	
<810>	Reporting Carrier Thumb Cellular, LLC			
<811>				
<812>	Operating Company			
<813>	<a1></a1>		<a2></a2>	<a3></a3>
	Affiliates		SAC	Doing Business As Company or Brand Designation
•				
·		See atta	See attached worksheet	et
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(900) Tribal Lands Reporting Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010> Study Area Code	319005
	Thumb Cellular LLC
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Paul Picklo
<035> Contact Telephone Number - Number of person identified in data line <030>	> 9894534330 ext.
Contact Email Address - Email Address of person identified	> paulpicklo@thumbcellular.com
<910> Tribal Land(s) on which ETC Serves	
] [	
<920> Tribal Government Engagement Obligation	
	Name of Attached Document
If your company serves Tribal lands, please select (Yes,No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to \$ 54.313(a)(9) includes:  <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.  <922> Feasibility and sustainability planning;  <923> Marketing services in a culturally sensitive manner;  <924> Compliance with Rights of way processes  <925> Compliance with Facilities Siting rules  <925> Compliance with Facilities Siting rules  <926> Compliance with Cultural Preservation review processes  <928> Compliance with Tribal Business and Licensing requirements.	Select (Yes,No, NA)

(1200) To Lifeline Data Col	(1200) Terms and Condition for Lifeline Customers Lifeline Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code Study Area Name	319005 Thumb Cellular LLC
<020>		2015
<030>	Contact Name - Person USAC should contact regarding this data	
<035>	Contact Telephone Number - Number of person identified in data line <030> Contact Email Address - Email Address of person identified in data line <030>	030> 9894534330 ext.
		319005mi1210.pdf
<1210>	· Terms & Conditions of Voice Telephony Lifeline Plans	
		Name of Attached Document
<1220>	Link to Public Website	НТТР
"Please check th or the website li § 54.422(a)(2) a annually report:	"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:	
<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	
<1222>	Details on the number of minutes provided as part of the plan, $\ lacksquare$	
<1223>	Additional charges for toll calls, and rates for each such plan. $oxedsymbol{ extstyle oxedsymbol{ extstyle  extstyle oxed}}$	

(2000) Price Cap Carrier Additional Documentation  FCC Form 481  OMB Control No. 3060-0986/OMB Control No. 3060-0886/OMB Control No. 3060-0819	um Carriers affiliated with Price Cap Local Exchange Carriers	2 John Stanner		111dillo Celiata	e - Person USAC should contact regarding this data	ta line <030>	Contact Email Address - Email Address of person identified in data line <030> paulpicklo@thumbcellular.com	ct America ,(c),(d),(e)	ncremental Connect America Phase I renortine	2nd Year Certification {47 CFR § 54.313(b)(1)}	3rd Year Certification {47 CFR § 54.313(b)(2)}	Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a))	2013 Frozen Support Certification	2014 Frozen Support Certification	2015 Frozen Support Certification	2016 and future Frozen Support Certification	Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}	Certification Support Used to Build Broadband	Connect America Phase II Reporting {47 CFR § 54.313(e)} 3rd year Broadband Service Certification 5th year Broadband Service Certification Interim Propress Certification	Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	Interim Progress Community Anchor Institutions	
(2000) Price Cap Carrier Additional Data Collection Form	Rate-of-Return Carriers affi	Study Area Code	Study Area Name	Program Year	Contact Name - Person USAC	Contact Telephone Number	Contact Email Address - Ema	ne boxes below to note compl	Incremental Connect Americ	2nd Year Certificatio	3rd Year Certification	Price Cap Carrier Receiving F	 2013 Frozen Support	2014 Frozen Support	2015 Frozen Support	2016 and future Froz	Price Cap Carrier Connect Ar	Certification Support	Connect America Phase II Re 3rd year Broadband Sei 5th year Broadband Sei Interim Progress Certifi	Please check the box to or pursuant to § 54.313 (e) addresses of community preceding calendar year.	Interim Progress Con	
(2000) Pr Data Coll	Including	<010>	<0.15>	<020>	<030>	<032>	<039>	CHECK th		<2010>	<2011>		<2017>	<2013>	<2014>	<2015>		<2016>	<2017> <2018> <2019>	<2020>	<2021>	

Data Co	Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	> Study Area Code	319005
<015>		Thumb Cellular LLC
<020>		2015
<035>	Contact Telephone Number - Number of	F4UL FLALL 9894534330 PXE
<039>	Contact Email Address - Email Address	paulpicklo@thumbcellular.com
CHECK	CHECK the boxes below to note compliance on its five year service quality plan (pursus	its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFB & 6.8.3 134(17) 1. furbac cartis, that the information reported on this form and in the documents attached below is accurate
(3010)	Progress Report on 5 Year Plan Milestone Certification (47 CFR § 54.313(f)(1)(i))	
		Name of Attached Document Listing Required Information
(3011)	Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	8012 contains the required information pursuant to asses of community anchor institutions to which began
(3012)	Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii)}	
		The second of th
(3013)	) Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)} .) If yes, does your company file the RUS annual report	Name of Attached Document Listing Required Information (Yes/No) (Yes/No) (Yes/No)
Pleas	e check these boxes to confirm that the attached document(s), on line 30	Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:
(3015)	<ul> <li>Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)</li> </ul>	
(3016)	_	sh Flows
(3017)	) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	
		Name of Attached Document Listing Required Information
(3018)		(Yes/No)
(3019)	If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains )  Éither a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications	ormat comparable to RUS Operating Report for Telecommunications
(3020)	) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	ash Flows
(3021)	) Management letter issued by the independent certified public accountant that performed the company's financial audit.	performed the company's financial audit.
	if the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to $\S$ 54.313(f)(2), contains:	
(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to B IIS Observing Boards for Talescommunications.	
	Borrowers,	
(3023)		] []
(3024)	<ul> <li>Underlying information subjected to an officer certification.</li> <li>Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows</li> </ul>	ash Flows
(3026)	) Attach the worksheet listing required information	
		Name of Attached Decimant listing Beaulised Information
		Name of Attached Document from the mountained and t

Certification - Reporting Carrier	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	319005
<015>	Study Area Name	Thumb Cellular LLC
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Paul Picklo
<035>	Contact Telephone Number - Number of person identified in data line <030>	9894534330 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	paulpicklo@thumbcellular.com

#### TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

# Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate. Name of Reporting Carrier: Signature of Authorized Officer: Date Printed name of Authorized Officer: Title or position of Authorized Officer: Telephone number of Authorized Officer: Study Area Code of Reporting Carrier: Filling Due Date for this form: Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment

under Title 18 of the United States Code, 18 U.S.C. § 1001.

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010> Study Area Code	319005
<015> Study Area Name	Thumb Cellular LLC

<010>	Study Area Code	319003
<015>	Study Area Name	Thumb Cellular LLC
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Paul Picklo
<035>	Contact Telephone Number - Number of person identified in data line <030>	9894534330 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	paulpicklo@thumbcellular.com

#### TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

## Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier I certify that (Name of Agent) Neal B Eichler is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate. Name of Authorized Agent: Neal B Eichler Name of Reporting Carrier: Thumb Cellular LLC Signature of Authorized Officer: CERTIFIED ONLINE Date: 06/23/2014 Printed name of Authorized Officer: Vice President Telephone number of Authorized Officer: 9894534391 ext. Study Area Code of Reporting Carrier: 319005 Filing Due Date for this form: 07/01/2014 Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment

#### TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.
Name of Reporting Carrier: Thumb Cellular LLC
Name of Authorized Agent or Employee of Agent: John Staurulakis, Inc.
Signature of Authorized Agent or Employee of Agent: CERTIFIED ONLINE Date: 06/23/2014
Printed name of Authorized Agent or Employee of Agent: Amanda Molina
Title or position of Authorized Agent or Employee of Agent Consultant Regulatory Affairs
Telephone number of Authorized Agent or Employee of Agent: 7705692105 ext.
Study Area Code of Reporting Carrier: 319005 Filing Due Date for this form: 07/01/2014
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.



Thumb Cellular, LLC's demonstration of complying with applicable service quality standards and consumer protection rules for voice services:

In establishing this certification in its 2005 ETC Order,<sup>1</sup> the FCC found that an ETC must make "a specific commitment to objective measures to protect consumers." The FCC found that for wireless ETCs, compliance with CTIA's Consumer Code for Wireless Service would satisfy this requirement and that the sufficiency of other commitments would be considered on a case-by-case basis.<sup>3</sup> In this context, the FCC stated, "to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement."

As a cellular provider, the Company is concerned about customer privacy and safety issues. The Company certifies that it has and will continue to comply with all applicable consumer protection laws and rules and all applicable service quality laws and rules. This document details the processes and procedures that the Company follows to ensure compliance.

The Company provides 2-way commercial mobile radio services (CMRS), or wireless service, to customers in Michigan's "Thumb" area (in the eastern part of the Lower Peninsula in Huron, Tuscola, and Sanilac Counties). Caro, Bad Axe, Vassar, Sandusky, Cass City, and Croswell are the largest cities in those counties. The Company holds an FCC license for the

<sup>&</sup>lt;sup>1</sup> Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) ("2005 ETC Order").

<sup>&</sup>lt;sup>2</sup> *Id.* at para. 28.

<sup>&</sup>lt;sup>3</sup> *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: "(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy." *Id.* at n. 71.

B-side wireline cellular service market designated as Michigan Rural Service Area (RSA) 10. The Company's network consists of 48 cell sites with 134 sectors and a Nortel DMS-100 switch, through which it provides coverage to virtually all of the population located in RSA 10. The Company provides wireless telecommunications services to approximately 35,000 customers in its service area. It provides service as an ETC in the following exchanges within its FCC-authorized licensed area:

Wire Center	CLLI Code	Study Area No.
Pigeon Telephone	PGNIMIXJDS0	310721
Wolverine Telephone Fostoria Millington	FSTRMIXIRS1 MGTNMIXIDS1	310738 310738
Century Telephone Marlette Caro Port Hope Port Austin	MRLTMIXIDS0 CAROMIXIDS1 PTHPMIXIDS0 PTASMIXIDS0	310702 310702 310702 310702

As a wireless carrier in Michigan, the Company has operated for many years in the telecommunications industry, an industry that has had varying degrees of regulation over time. The Company's long-time operations in this industry have made it well aware of all applicable standards and rules, including those pertaining to service quality standards and consumer protection. The Company routinely reviews and stays abreast of changes in standards and rules, including those pertaining to service quality standards and consumer protection, among other ways, by (1) regularly conferring with and contacting consultants and attorneys who regularly monitor changes in federal and state law and who provide alerts and updates to the Company; and (2) continuing its membership in the Competitive Carriers

Association – a national telecommunications industry association that monitors changes in the law and provides information to its members.

Thumb Cellular, LLC ("Company") hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company complies with the Cellular Telecommunications Industry Association Consumer Code for Wireless Service ("CTIA Code") as explained below, and does business as Thumb Cellular.

Thumb Cellular, LLC, adheres to 11 points within the CTIA Consumer Code, including disclosing rates, additional taxes, fees, surcharges and terms of service; providing coverage maps; making customer service readily accessible; and allowing a 14-day trial period for new service.

### 1. THUMB CELLULAR, LLC, DISCLOSES RATES AND TERMS OF SERVICE TO CONSUMERS

For each service plan offered to new consumers, Thumb Cellular, LLC, discloses to consumers at point of sale and on its web sites, at least the following information, as applicable: (a) the coverage area for service; (b) any activation or initiation fee; (c) the monthly access fee or base charges; (d) the amount and nature of any voice, messaging, or data allowances included in the plan (such as night and weekend minutes); (e) the charges for domestic usage in excess of any included allowances or outside of the coverage area; (f) for prepaid service plans, the period of time during which any balance is available for use; (g) whether there are prohibitions on data service usage and whether there are network management practices that will have a material impact on the customer's wireless data experience; (h) whether any additional taxes, fees or surcharges apply; (i) the amount or range of any such fees or surcharges that are collected and retained by the carrier; (j) the amount or nature of any late payment fee; (k) whether a fixed-term contract is required and its duration; (1) the amount and nature of any early termination fee that may apply; and (m) the trial period during which a consumer may cancel service without any early termination fee, as long as the consumer complies with any applicable return policy.

2. THUMB CELLULAR, LLC, MAKES AVAILABLE MAPS SHOWING WHERE SERVICE IS GENERALLY AVAILABLE Thumb Cellular, LLC, makes available at point of sale and on its web sites maps depicting approximate domestic coverage applicable to each of their

service plans currently offered to consumers. To enable consumers to make comparisons among carriers, Thumb Cellular, LLC, generated the maps using generally accepted methodologies and standards to depict outdoor coverage. All such maps will contain or link to an appropriate legend concerning limitations and/or variations in wireless coverage and map usage, including any geographic limitations on the availability of any services included in the plan. Thumb Cellular, LLC, periodically updates such maps as necessary to keep them reasonable current. If necessary to show the extent of service coverage available to customers from carriers' roaming partners, Thumb Cellular, LLC, incorporates coverage maps from roaming partners that are generated using similar industry-accepted criteria, or if such information is not available, incorporate publicly available information regarding roaming partners' coverage areas.

- 3. THUMB CELLULAR, LLC, PROVIDES CONTRACT TERMS TO CUSTOMERS AND CONFIRMS CHANGES IN SERVICE When a customer initiates new service or a change in existing service, Thumb Cellular, LLC, provides or confirms any new material terms and conditions of the ongoing service with the customer.
- 4. THUMB CELLULAR, LLC, ALLOWS A TRIAL PERIOD FOR NEW SERVICE

When a customer initiates postpaid service with Thumb Cellular, LLC, the customer will be informed of and given a period of not less than 14 days to try out the service. Thumb Cellular, LLC, does not impose an early termination fee if the customer cancels service within this period, provided that the customer complies with applicable return and/or exchange policies. Other charges, including usage charges, may still apply.

5. THUMB CELLULAR, LLC, PROVIDES SPECIFIC DISCLOSURES IN ADVERTISING

In advertising of prices for wireless service plans or devices, Thumb Cellular, LLC, discloses material charges and conditions related to the advertised prices and services, including if applicable and to the extend the advertising medium reasonably allows: (a) whether activation or initiation fees apply; (b) monthly access fees or base charges; (c) the amount and nature of any voice, messaging, or data service allowances included in the plan; (d) the charges for any domestic usage in excess of any included allowances or outside of the coverage area; (e) for prepaid service plans, the period of time during which any balance is available for use; (f) whether there are network management practices that will have a material impact on the customer's wireless data experience; (g) whether any additional taxes, fees or surcharges apply; (h) the amount or range of any such fees or surcharges that are collected and retained by the carrier; (i) whether a fixed-term contract is required and its duration; (j) early termination fees; (k) the terms and conditions related to receiving a product or service for "free"; (1) for any service plan advertised as "nationwide", (or using similar terms), the carrier will have available substantiation for this claim; and (i) whether prices or benefits apply only for

a limited time or promotional period and, if so, whether any different fees or charges will apply for the remainder of the contract term.

- 6. THUMB CELLULAR, LLC, SEPARATELY IDENTIFIES CARRIER CHARGES FROM TAXES ON BILLING STATEMENTS On customers' bills, Thumb Cellular, LLC, distinguishes (a) monthly charges for service and features, and other charges collected and retained by Thumb Cellular, LLC, from (b) taxes, fees and other charges collected by Thumb Cellular, LLC, and remitted to federal, state, or local governments. Thumb Cellular, LLC, will not label cost recovery fees or charges as taxes.
- 7. THUMB CELLULAR, LLC, PROVIDES CUSTOMERS THE RIGHT TO TERMINATE SERVICE FOR CHANGES TO CONTRACT TERMS Thumb Cellular, LLC, will not modify the material terms of their postpaid customers' contracts in a manner that is materially adverse to those customers without providing a reasonable advance notice of a proposed modification and allowing those customer a time period of not less than 14 days to cancel their contracts with no early termination fee.
- 8. THUMB CELLULAR, LLC, PROVIDES READY ACCESS TO CUSTOMER SERVICE
  - Customers will be provided a toll-free telephone number to access Thumb Cellular, LLC's, customer service during normal business hours. Customer service contact information will be provided to customers online and on billing statements. Thumb Cellular, LLC, provides information about how customers can contact the carrier in writing, by toll-free telephone number, via the Internet or otherwise with any inquiries or complaints, and this information is included, at a minimum, on all billing statements, in written responses to customer inquiries and on Thumb Cellular, LLC, web sites. Thumb Cellular, LLC, also makes such contact information available, upon request, to any customer calling customer service departments.
- 9. THUMB CELLULAR, LLC, PROMPTLY RESPONDS TO CONSUMER INQUIRIES AND COMPLAINTS RECEIVED FROM GOVERNMENT AGENCIES
  - Thumb Cellular, LLC, responds in writing to state or federal administrative agencies within 30 days of receiving written consumer complaints from any such agency.
- 10. THUMB CELLULAR, LLC, ABIDES BY POLICIES FOR PROTECTION OF CUSTOMER PRIVACY
  - Thumb Cellular, LLC, abides by a policy regarding the privacy of customer information in accordance with applicable federal and state laws, and makes available to the public its privacy policy concerning information collected online. Thumb Cellular, LLC, abides by the CTIA Best Practices and Guidelines or Location-Based Services.
- 11. THUMB CELLULAR, LLC, PROVIDES CONSUMERS WITH FREE NOTIFICATIONS FOR VOICE, DATA AND MESSAGING USAGE, AND INTERNATIONAL ROAMING
  - Thumb Cellular, LLC, provides, at no charge: (a) a notification to consumers of currently-offered and future domestic wireless plans that include limited

data allowances when consumers approach and exceed their allowance for data usage and will incur overage charges; (b) a notification to consumers of currently-offered and future domestic voice and messaging plans that include limited voice and messaging allowances when consumers approach and exceed their allowance for those services and will incur overage charges; and (c) a notification to consumers without an international roaming plan/package whose devices have registered abroad and who may incur charges for international usage. Thumb Cellular, LLC, generates the notifications described above to postpaid consumers based on information available at the time the notification is sent. Wireless consumers will not have to affirmatively sign up in order for these notifications to be sent. Thumb Cellular, LLC, clearly and conspicuously discloses tools or services that enable consumers to track, monitor and/or set limits on voice, messaging and data usage.

In addition to the aforementioned CTIA compliance, Thumb Cellular, LLC, as a licensed wireless carrier in the state of Michigan, is subject to consumer protection obligations to the extent applicable to wireless carriers under the rules of the Michigan Public Service Commission (MPSC) and state law. These obligations include, but are not limited to, the following: (1) compliance with the Michigan Consumer Protection Act sections 445 and 484; (2) compliance with Anti-Slamming procedures and related rules that the MPSC adopted in MPSC Case U-11757 and Case U-11900; and (3) CPNI, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

Moreover, as a licensed wireless carrier in Michigan, the Company is subject to the Michigan Telecommunications Act (MTA), MCL 484.2101 *et seq*. (to the extent it covers wireless carriers) and the Michigan Public Service Commission's (MPSC) jurisdiction (to the same extent). And insofar as it applies to wireless service, the Company must also comply with the applicable rules the MPSC adopts under the MTA, the federal Communications Act (FTA), and rules the FCC adopts under the FTA. And as a Michigan business, the Company must comply with generally applicable state consumer protection laws.

Some obligations imposed by state and federal law relate to both service quality and consumer protection. And there are also some obligations state or federal law imposes that are specifically for consumer protection. These obligations include the following:

- (1) complying with Michigan's consumer protection law, MCL 445.901 *et seq;*
- (2) to the extent relevant to wireless carriers, complying with the MTA's consumer-oriented conduct requirements set forth in MCL 484.2502, which prohibits, among other things, false, deceptive, and misleading statements; charging a customer for a service the customer did not order; charging a customer for service after the customer has cancelled service; causing a probability of confusion or misunderstanding as to a customer's legal rights; misleading representations regarding the delivery of service; and certain disconnections;
- (3) to the extent relevant to wireless carriers, complying with Michigan Anti-Slamming Procedures, including those in the MTA, MCL 484.2305, and related rules the MPSC adopted, such as those adopted in Orders in MPSC Case Nos. U-11757 and U-11900;
- (4) to the extent relevant to wireless carriers, complying with the state and federal requirements regarding truth-in-billing, E 9-1-1 service, and basic local exchange service per Section 2305b(c) of the MTA, MCL 484.2305b(c);
- (5) complying with the MTA's duties applicable to all telecommunication providers, including providing a customer upon request with a simple

explanation of the terms of service, which includes a statement of all fees and charges that will be included on the customer's monthly bill, per MCL 464.2305b(a); and

(6) to the extent relevant to wireless carriers, complying with state and federal requirements relating to protecting customers' privacy, including state and federal requirements as to confidential proprietary network information (CPNI) and identity theft.

The Company has consistently complied with all of the above obligations imposed by state and federal law related to service quality and consumer protection by, among other things, the following:

- it complies with all applicable state and federal consumer protection and service quality standards (including any that the MPSC and FCC adopted);
- it complies with Michigan consumer protection requirements in Michigan's consumer protection law, MCL 445.901 *et seq*;
- it has trained its customer service representatives to explain to customers rates, charges, and terms of service, available programs, customers' rights, and to furnish customers with reasonable access to information and assistance and the like:
- it has trained its customer service representatives to interact with customers respectfully and in accordance with consumer protections;
- it maintains a business office adequately staffed with qualified persons to assist customers and notify customers of their rights;
- to the extent applicable to wireless carriers, it complies with applicable state and federal requirements regarding truth-in-billing, E 9-1-1 service, and basic local exchange service per Section 2305b(c) of the MTA, MCL 484.2305b(c) and those identified in the MPSC's Orders in Case No. U-11043 (regarding billing standards);
- it has adopted a CPNI compliance manual consistent with all applicable laws;

• it certified to the FCC in February 2013 that it complies with the FCC's CPNI rules;

- it sends at least annually and often twice a year its customers an optout bill message regarding its privacy policy. (In 2013, it sent the notice that printed with its May 16, 2013 invoices and will also print and send another notice with its June 1, 2013 invoices);
- it regularly notifies its customers regarding the \*67 feature and similar functions;
- it regularly notifies its customers of the Do-Not-Call list and how to participate;
- it has adopted an Identity Theft Prevention Program and Policy consistent with all applicable "Red Flag" rules;
- it passes through to its customers all state and federal Lifeline and Link-up discounts, and notifies its customers of the Lifeline and Link-up programs and how to apply if eligible;
- it complies with Michigan Anti-Slamming Procedures, including those in the MTA and related rules the MPSC adopted, such as those adopted in Orders in MPSC Case Nos. U-11757 and U-11900; and
- it complies with state and federal requirements relating to protecting customers' privacy, including state and federal requirements as to confidential proprietary network information (CPNI) and identity theft.

### Thumb Cellular, LLC's demonstration of ability to function in emergency situations for voice services:

Thumb Cellular, LLC ("Company") hereby certifies that it is able to function in emergency situations as set forth in the Code of Federal Regulations, Title 47, Part 54, Subpart C, §54.202(a)(2)¹ and the Michigan Telecommunications Act (MTA). The Company's network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, the central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. The Company has battery backup at all office locations and in its electronic equipment sites in accordance with the specifications identified in Section 305c(a) of the MTA, 484.2305c.

The Company has a central office in Pigeon, Michigan. Its central office is equipped with permanent battery back-up power – with battery packs bolted to the floor. That central office's battery packs provide up to about 12 hours of battery back-up functionality. It also has a standby generator in place in its central office. The company also has a large portable generator that can also be used to provide functionality. Those generators, coupled with the permanent battery back-up, enable the Company's central office to keep running for up to about at least 12 hours on pure battery-

Section 54.202(a)(2) requires ETCs that are designated by the Commission to "demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."

back-up power, and indefinitely until either power is restored on generator power (so long as fuel is available for the generators) or system changes are made to re-route traffic.

Therefore, as to the requirement in 47 CFR 54.202(a)(2), it has at least 12 hours of back-up battery power that allow it to function in an emergency situation without an external power source.

The Company's permanent and portable generators as its central office also allow it to provide power if there is no external power source for an unlimited amount of time (as long as fuel was available).

In addition, the Company has implemented industry practices to re-route traffic around damaged facilities and to manage traffic spikes resulting from emergency situations. It can re-route traffic around damaged facilities by electrical redundancy for all routes that come to the Company's central office. Electrical redundancy means that if the Company had problems with one fiber, it could shift the traffic from that one fiber to another fiber in the same sheath since a fiber sheath has several fiber strands within it.

Further, it can manage traffic spikes resulting from an emergency situation by having back-up power ready and available and having toll electrical redundancy, meaning that all of the Company's facilities are able to keep traffic moving and connecting to manage any traffic spikes that may arise from emergency situations. The Company can also change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations also allows the Company to manage traffic spikes throughout its network, as emergency situations require.

As the above demonstrates, the Company can re-route originating traffic to alternate transport carriers with interconnecting facilities are out of service. This allows all of the Company's facilities to keep traffic moving and connecting to manage any traffic spikes that may arise from emergency situations. The Company can also change call routing translations as needed to re-route traffic around damaged facilities. Changing call routing translations also allows the Company to manage traffic spikes throughout its network, as emergency situations require. Its network is engineered to provide

maximum capacity to handle excess traffic in the event of traffic spikes resulting from emergency situations.

The Company also meets the requirements in MCL 484.2305c. As explained above, it has equipped its central office, remote switch, and remote line unit, and interexchange toll switching office or access tandem far above the minimum hours of peak load battery reserve. It also has a permanent generator at its central office, along with a portable generator that may be used to connect its central offices, remote switches, and remote line units within 8 hours.<sup>2</sup>

<sup>&</sup>lt;sup>2</sup> The Company has reasonable amounts of back-up power to provide functionality without an external power source in the form of battery back-up power at each cell site, which enables it to provide service for a minimum of 4-6 hours. It has back-up portable power generators that can be deployed in emergency situations.

(700) Price Offerings including Voice Rate Data	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	<010> Study Area Code	319005
<015>	<015> Study Area Name	Thumb Cellular LLC
<020>	<020> Program Year	2015
<030>	<030> Contact Name - Person USAC should contact regarding this data	Paul Picklo
<032>	<035> Contact Telephone Number - Number of person identified in data line <030>	<pre>&lt;030&gt; 9894534330 ext.</pre>
<039>	<039> Contact Email Address - Email Address of person identified in data line <030>	<pre></pre>

<701> Residential Local Service Charge Effective Date
<702> Single State-wide Residential Local Service Charge

<703>

1/1/2014

	Fees																		
<c></c>	Total per line Rates and Fees	19.99	29.99	35.0	50.0	65.0	45.0	14.99	39.99	49.99	59.99	79.99	66.66	119.99	149.99	55.0	75.0	95.0	
<	Mandatory Extended Area Service Charge	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
 b4>	State Universal Service Fee	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
 	State Subscriber Line Charge	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
 	Residential Local Service Rate	19.99	29.99	35.0	50.0	65.0	45.0	14.99	39.99	49.99	59.99	79.99	66.66	119.99	149.99	55.0	75.0	95.0	
  	Rate Type	MT	MT	MT	MT	MT	FR	MT	MT	MT	MT	MT							
<a3></a3>	SAC (CETC)																		
<a2></a2>	Exchange (ILEC)																		
<a1></a1>	State	MI	MI	MI	MI	MI	MI	MI	MI	MI	MI	MI	MI	MI	MI	MI	MI	MI	

FCC Form 481	OMB Control No. 3060-0986/OMB Control No. 3060-0819	July 2013
(710) Broadband Price Offerings	Data Collection Form	

			Thumb Cellular	ITC			
			2015				
Person USAC should	d contact regarding	this data	Paul Picklo				
one Number - Numb	oer of person identifi	ed in data line <030>					
Address - Email Addr	ess of person identif	ied in data line <030:		mbcellular.com			
<a2></a2>	<	 	<c> <d1></d1></c>		<q3></q3>		<44>
xchange (ILEC)	Residential Rate	State Regulated Fees	Total Rates and Fees	Broadband Service - Download Speed (Mbps)	(sd	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached {select}
	0.0	0.0	0.0	0.0	0.0	0.0	Other, CETC not required to report broadband
	Study Area Name Program Year Contact Name - Person USAC shoul Contact Telephone Number - Numb Contact Email Address - Exchange (ILEC)  State  **IT**  **IT**	Name me - Person USAC should contact regarding ephone Number - Number of person identif ail Address - Email Address of person identif ca2>	Program Year  Contact Name - Person USAC should contact regarding this data  Contact Telephone Number - Number of person identified in data line <0300  Contact Email Address of person identified in data line <0300  contact Email Address of person identified in data line <0300  contact Email Address of person identified in data line <0300  contact Email Address of person identified in data line <0300  contact Email Address of person identified in data line <0300  contact Email Address of person identified in data line <0300  contact Telephone Number - Number of person identified in data line <0300  contact Telephone Number - Number of person identified in data line <0300  contact Telephone Number - Number of person identified in data line <0300  contact Telephone Number - Number of person identified in data line <0300  contact Telephone Number - Number of person identified in data line <0300  contact Telephone Number - Number of person identified in data line <0300  contact Telephone Number - Number of person identified in data line <0300  contact Telephone Number - Number of person identified in data line <0300  contact Telephone Number - Number of person identified in data line <0300  contact Telephone Number of person identified in data line <0300  contact Telephone Number of person identified in data line <0300  contact Telephone Number of person identified in data line <0300  contact Telephone Number of person identified in data line <0300  contact Telephone Number of person identified in data line <0300  contact Telephone Number of person identified in data line <0300  contact Telephone Number of person identified in data line <0300  contact Telephone Number of Person identified in data line <0300  contact Telephone Number of Person identified in data line <0300  contact Telephone Number of Person identified in data line <0300  contact Telephone Number of Person identified in data line <0300  contact Telephone Number of Person identified in data line <0300  contact Telephone Number of Person identified in	<030> <030> <030> cc> cc>	Thumb Cellular LLC	### Thumb Cellular LLC  2015  Paul Picklo  4030> 9894534330 ext.  4040> 4040> 4040  Columbrated and Fees Broadband Service Download Speed (Mbps)    O.0	### Thumb Cellular LEC  2015  Paul Picklo  4030> 9894534330 ext.  4030> paulpicklo@thumbcellular.com  4040  Co.0  0.0  0.0  0.0  0.0  0.0  0.0  0

(800) Operating Companies	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

									<a3></a3>	Doing Business As Company or Brand Designation	Pigeon Telephone Company	Agri-Valley Broadband, Inc. & AVBI & miSpot	Agri-Valley Services, Inc. & AVCI.net										
	ar LLC			t.	paulpicklo@thumbcellular.com				<a2></a2>	SAC	310721												
319005	Thumb Cellular LLC	2015	Paul Picklo	9894534330 ext.	paulpicklo@tl																		
> Study Area Code	> Study Area Name	> Program Year	> Contact Name - Person USAC should contact regarding this data	> Contact Telephone Number - Number of person identified in data line <030>	> Contact Email Address - Email Address of person identified in data line <030>	Reporting Carrier     Thumb Cellular, LLC			<41>	Affiliates	Pigeon Telephone Company	Agri-Valley Broadband, Inc.	Agri-Valley Services, Inc.										
<010>	<015>	<020>	<030>	<035>	<039>	<810>	<811>	<812>	<813>														



# Thumb Cellular's Lifeline and Link-Up Services

The Lifeline Telephone Assistance Program makes residential telephone service more affordable for qualifying low-income households throughout Michigan. Qualifying low-income households receive reduced charges on their monthly telephone bill and reduced installation charges.

### Program Benefits

Lifeline offers three primary benefits to qualifying consumers:

Reduced Charges - Households receive a monthly discount in their local telephone service charges. In most cases, the discount is \$11.25 per

Option to Elect Toll Blocking in Lieu of a Service Deposit - Consumers have the option of blocking outgoing long distance toll calls free of charge. It the applicant elects this option, the local telephone company will not collect a service deposit in order to initiate Lifeline service.

Reduction in Local Telephone Line Installation Service Charges - Pursuant to the Link-up America Program, a qualifying customer is eligible for a 50% reduction on local telephone line installation service charges.

### Eligibility

Lifeline and Link-Up services are available to certain low-income consumers who meet the following criteria:

Applicant's household income does not exceed 150% of current federal poverty standards. Documentation of income is required.

### S O

- Enhanced Tribal Lifeline applicants may be eligible if they live on or near a federally recognized reservation and participate in one of the following programs:
  - Bureau of Indian Affairs General Assistance Programs
- Tribally Administered TANF
- Head Start Programs (if you satisfy the income qualifying standards)
  - National School Lunch Program's Free Lunch Program.

The maximum income amount varies according to the number of people in the household. The application must be completed by the person in whose name the phone is listed, and the phone number listed must be the applicant's primary residence.

### If you have questions or need any further information, please contact:

Lifeline Administration Service PO Box 4173 East Lansing, MI 48823 Toll Free 866-321-2323

### Michigan Lifeline Administration Service

### LIFELINE APPLICATION

Eligible customers will receive \$11.25 off their monthly phone bill and seniors aged 65 and older can receive additional discounts.

### **TOLL FREE 1-866-321-2323**

To apply for Lifeline Service, complete the application below and send it to:

Lifeline Administration Service

PO Box 11037, Lansing, Michigan 48901 OR fax to 517-482-3548

**IDENTIFICATION INFORMATION** (PLEASE PRINT)

Applicant's phone number:		Name of phone compa	iny:									
Date of Birth:	Last 4-digi	ts of Social Security Num	nber:									
Last Name:	Fir	st Name:		M.I.:								
Street: Residential street address only; FCC regul	ations proh	libit the use of P.O. Box	es for the Lif	feline program								
City:	:	State:		ZIP Code:								
This is my permanent address: Yes 🔲 No	This	is a rural address with no	o postal rout	e: Yes 🔲 No 🗀	]							
Billing Address, City, State and Zip Code (in	f different f	rom Service Address)										
There are multiple unique households (e. nursing home, assisted living facility) at naddress, as defined in this program.	-	YES		NO 🗆								
PROGRAM QUALIFICATION INFORMATION												
To be eligible for Lifeline discounts, regulations require you to qualify via one of the two methods below. Please fill out one section only.												
Method 1. My income is within the guidelines and I am providing the following photocopies that document my total household income, which is stated below. Please check all that apply.												
TOTAL MONTHLY INCOME: \$ NUMBER OF HOUSEHOLD MEMBERS:												
# of Household Members	C	Gross Monthly Income	Gross A	nnual Income <sup>*</sup>								
1		\$1,459	t	17,505								
2 3		\$1,966	23,595									
4		\$2,474 \$2,981	35,775									
*Add \$6,090 (\$508 monthly) fo	r each additio											
Prior year's state or federal tax return	١.	Current Annual Income Statement from Employer										
Social Security statement of benefits		Paycheck stubs or other official document containing income information for any 3 consecutive months within last 12 months										
Retirement/pension statement of ben	efits	☐ Veterans Administration statement of benefits										
Unemployment/Worker's Compensations Statement of Benefits	ion	Divorce decree or child support document containing income information										
Method 2. I, or the member of my household named below, receives assistance from one of the listed programs. I am providing documentation of participation in the checked program.												
Name:	Name:											
☐ Food stamps		Federal Public Housing Assistance or Section 8										
☐ Medicaid		Temporary Assistance for Needy Families (TANF)										
Supplemental Security Income		☐ National School Lunch – Free Lunch Program										
☐ Low-Income Home Energy Plan (LIHEA	P)											

LIFELINE ADMINISTRATION SERVICE PROCESSES APPLICATIONS FOR THE FOLLOWING COMPANIES				
Ace Communications	Chapin Telephone Company	Sand Creek Telephone Company		
Allband Communications Coop.	Chippewa County Telephone Company	Southwest Michigan Communications		
Allendale Telephone Company	Climax Telephone Company	Springport Telephone Company		
Baraga Telephone Company	Deerfield Farmers' Telephone Co.	TDS Telecom		
Barry County Telephone Company	Hiawatha Telephone Company	Thumb Cellular		
Blanchard Telephone Company	Kaleva Telephone Company	Upper Peninsula Telephone Company		
Bloomingdale Communications	Lennon Telephone Company	Waldron Telephone Company		
Carr Telephone Company	Michigan Central Broadband Co.	Westphalia Broadband, Inc./Comlink		
CenturyLink of Michigan	Midway Telephone Company	Westphalia Telephone Company		
CenturyLink of Midwest Michigan	Ogden Communications	Winn Telecom		
CenturyLink of Northern Michigan	Ontonagon County Telephone Co.	Winn Telephone Company		
CenturyLink of Upper Michigan	Pigeon Telephone Company			

For more information, please call 1-866-321-2323.

If your phone company is not on the list above, please contact them directly to apply for Lifeline discounts.

ADDII	CANT	ACKNO	WIED	GEM	FNITS
	CANI	ACNING	/		

PLEASE READ AND INITIAL EACH OF THE FOLLOWING STATEMENTS TO INDICATE THAT YOU UNDERSTAND AND AGREE:

—I understand and consent to Lifeline Administration Service providing my Lifeline service account information, including but not limited to, my name, residential address, phone number, date of birth, the last 4 digits of my soci security number, the date on which my Lifeline service was initiated/terminated, the amount of Lifeline support provided, and the means through which I qualified for Lifeline, to the Universal Service Administrative Company (USAC), USAC's agents and/or the National Lifeline Accountability Database to ensure the proper administration of Lifeline program. I understand that if I fail to provide this consent, Lifeline Administration Service will deny me Lifeline service.	
Lifeline is a non-transferable benefit and the subscriber may not transfer his or her benefit to any other person.	
—Lifeline is a federal benefit and willfully making false statements to obtain the benefit can result in fines,	
imprisonment, de-enrollment or being barred from the program.	
Lifeline support is only available for a single phone line at my principal residence and no one else in my household receiving Lifeline discounts. (A "household" is defined as any individual or group of individuals who live together at same address and share income and expenses.)	
<ul> <li>Violation of the one-per-household limitation constitutes a violation of the Federal Communication Commission's rand will result in the subscriber's de-enrollment from the program and potentially prosecution by the US government understand that if I am identified as receiving more than one Lifeline benefit, all telephone service providers involved may be notified so that I may select one service and be de-enrolled from the other(s).</li> </ul>	ent.
——I will notify my telephone company within 30 days if I no longer qualify for Lifeline and I may be subject to penaltie I fail to do so.	es if
——I will notify my telephone company within 30 days of any changes to my residential address.	
I will be required to certify my continued eligibility for Lifeline at least once a year and know failure to do so will re	sult

### **APPLICANT SIGNATURE**

I certify, under penalty of perjury, that the information provided in this application and supporting documentation is true and complete.

in termination of my participation in the program.

Signature:	Date:
	PEVISED 1/201A

### **Thumb Cellular Voice Service Plans**

Plan Local	Price	Peak Minutes	Off-Peak Minutes*	Additional Airtime Rate	Super-System Airtime Rate	Companion Rate	Additional Features Included
Thumb 100	\$19.99	100	n/a	\$0.30	\$0.40	\$10.00	N/A
Thumb 250	\$29.99	250	n/a	\$0.25	\$0.35	\$10.00	N/A
Thumb 350 FI	\$35.00	350	n/a	\$0.15	\$0.35	\$10.00	Free Incoming
THUIND 330 FT	ψ55.00	330	11/4	\$.25 peak	ψ0.00	Ψ10.00	1 rec meening
Thumb 3350	\$35.00	350	3000	.10 off-peak \$.20 peak	\$0.32	\$10.00	N/A
Thumb 5500	\$50.00	500	5000	.10 off-peak	\$0.32	\$10.00	N/A
Thumb 8000	\$65.00	1000	7000	\$.18 peak .10 off-peak	\$0.32	\$10.00	N/A
Speak Freely	\$45.00	Unlimited	Unlimited	N/A	\$0.50	\$20.00	1
Thumb 500	\$35.00	500	N/A	\$0.15	\$0.50	\$10.00	Can add National Minutes
mamb 666	ψοσ.σσ		14/7	ψ0.10	ψ0.00	Ψ10.00	Unlimited Mobile to Mobile, Unlimited
Starter Plan	\$14.99	0	0	\$0.15	\$0.15	n/a	Texting
Statewide				<b>A</b> - 1 -			
Michigan 100	\$19.99	100	N/A	\$0.40	N/A	\$10.00	N/A
Michigan 200	\$29.99	200	N/A	\$0.35	N/A	\$10.00	N/A
Michigan 300	\$39.99	300	N/A	\$0.32	N/A	\$10.00	N/A
Michigan 450	\$49.99	450	N/A	\$0.30	N/A	\$10.00	N/A
Michigan 650	\$59.99	650	N/A	\$0.30	N/A	\$10.00	N/A
Michigan 850	\$79.99	850	N/A	\$0.28	N/A	\$10.00	N/A
Michigan 1150	\$99.99	1150	N/A	\$0.25	N/A	\$10.00	N/A
Michigan 1500	\$119.99	1500	N/A	\$0.25	N/A	\$10.00	N/A
Michigan 2000	\$149.99	2000	N/A	\$0.25	N/A	\$10.00	N/A
Michigan 2250	\$35.00	250	2000	\$.35 peak .10 off-peak	N/A	\$10.00	N/A
Michigan 4400	\$50.00	400	4000	\$.30 peak .10 off-peak	N/A	\$10.00	N/A
Michigan 6750	\$65.00	750	6000	\$.25 peak .10 off-peak	N/A	\$10.00	N/A
Xpress 500	\$35.00	500	N/A	\$0.30	N/A	\$10.00	Group Mobile
Xpress 1000	\$55.00	1000	N/A	\$0.30	N/A	\$10.00	to Mobile* and
Xpress 1500	\$75.00	1500	N/A	\$0.30	N/A	\$10.00	3 Friends &
Xpress 2000	\$95.00	1100	N/A	\$0.30	N/A	\$10.00	Family #s*
National							
National Choice 750	\$40.00	750	Unlimited	\$0.25	N/A	\$15.00	Unlimited
National Choice 1500	\$70.00	1500	Unlimited	\$0.25	N/A	\$15.00	Home Mobile
National Choice 2250	\$100.00	2250	Unlimited	\$0.25	N/A	\$15.00	to Mobile*
National Choice 3000	\$125.00	3000	Unlimited	\$0.25	N/A	\$15.00	to Mobile
Family Choice 800	\$49.99	800	N/A	\$0.25	N/A	\$12.00	Group Mobile
Family Choice 1600	\$79.99	1600	N/A	\$0.25	N/A	\$12.00	to Mobile*,
Family Choice 2400	\$109.99	2400	N/A	\$0.25	N/A	\$12.00	Free Calling to
Family Choice 3500	\$149.99	3500	N/A	\$0.25	N/A	\$12.00	10#s*, Carry
Family Choice 4500	\$179.99	4500	N/A	\$0.25	N/A	\$12.00	Over Minutes
College Connection 1500	\$49.99	1500	N/A	\$0.25	N/A	N/A	Unlimited Texing and
College Connection	¥ 10100			¥61.26	. ,,		Nationwide
3000	\$69.99	3000	N/A	\$0.25	N/A	N/A	Data.
Everything Plans - Smartphones	\$75.00	unlimited	unlimited	N/A	N/A	\$45.00	Unlimited Texing and
Everything Plans - feature phones	\$60.00	unlimited	unlimited	N/A	N/A	\$35.00	Nationwide Data.
Old National Plans	<b>\$30.00</b>	J	u	14//	14//	ψοσ.σσ	1
National 100	\$29.99	100	N/A	\$0.45	N/A	\$10.00	N/A
National 200	\$39.99	200	N/A	\$0.40	N/A	\$10.00	N/A
National 350	\$59.99	350	N/A	\$0.35	N/A	\$10.00	N/A
National 550	\$79.99	550	N/A	\$0.25	N/A	\$10.00	N/A
National 750	\$99.99	750	N/A N/A	\$0.25	N/A	\$10.00	N/A N/A
			N/A N/A		N/A N/A		N/A N/A
National 1000	\$119.99	1000		\$0.25		\$10.00	
National 1450	\$149.99 \$35.00	1450 100	N/A 1000	\$0.25 \$.45 peak .10 off-peak	N/A N/A	\$10.00 \$10.00	N/A N/A
National 1100				\$.40 peak			
National 1100  National 3200	\$50.00	200	3000	.10 off-peak	N/A	\$10.00	N/A
	\$50.00 \$65.00	200 400	3000 5000		N/A N/A	\$10.00 \$10.00	N/A N/A